

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION**

LATOYA S. THOMPSON,

Plaintiff,

v.

**BAYER HEALTHCARE
PHARMACEUTICALS INC., BAYER
PHARMA AG, and BAYER OY,**

Defendants.

Civil Action No. 1:15-cv-01117-JES-JEH

**DECLARATION OF W. JASON RANKIN IN SUPPORT OF
DEFENDANTS' SUGGESTIONS IN OPPOSITION TO PLAINTIFF'S MOTION TO
EXCLUDE OPINIONS OF REGULATORY EXPERTS DENA R. HIXON, M.D. AND
DAVID W. FEIGAL JR., M.D.**

I, William Jason Rankin, being of full age, make the following declaration pursuant to 28 U.S.C. § 1746:

1. I am an attorney at law of the State of Illinois and am a Partner with the law firm of HeplerBroom LLC, attorneys for Defendants Bayer Healthcare Pharmaceuticals, Inc., Bayer Pharma AG, and Bayer Oy in the above-captioned matter.

2. I submit this Certification in support of the Defendants' Suggestions in Opposition to Plaintiff's Motion to Exclude Opinions of Regulatory Experts Dena R. Hixon, M.D. and David W. Feigal Jr., M.D.

3. Annexed hereto as Exhibit 1 is the Expert Report of Dr. David W. Feigal Jr., M.D., M.P.H. ("Feigal Rpt.") redacted pursuant to Local Rule 5.11.

4. Annexed hereto as Exhibit 2 are excerpts from the Deposition of David B. Ross, M.D., Ph.D., M.B.I. ("Ross Dep.").

Executed under penalty of perjury this 29th day of March, 2017.

Respectfully Submitted,

HEPLERBROOM LLC

By: /s/ W. Jason Rankin

W. Jason Rankin, #6237927

130 N Main

PO Box 510

Edwardsville, IL 62025-0510

Telephone: 618-307-1184

wjr@heplerbroom.com

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed on March 29, 2017, the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Lawrence L. Jones II
JONES WARD PLC
Marion E. Taylor Building
312 South Fourth Street, Sixth Floor
Louisville, KY 40202
larry@jonesward.com

Attorney for Plaintiff

/s/ W. Jason Rankin